

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

FORD GLOBAL TECHNOLOGIES, LLC,

Plaintiff,

v.

**NEW WORLD INTERNATIONAL, INC.,
AUTO LIGHTHOUSE PLUS, LLC and
UNITED COMMERCE CENTERS, INC.,**

Defendants.

Case No. 3:17-cv-03201-N

**PLAINTIFF'S RESPONSE IN OPPOSITION TO
DEFENDANTS' MOTION FOR PARTIAL
SUMMARY JUDGMENT ON DAMAGES AND
MOTION FOR SUMMARY JUDGMENT ON
PATENT INVALIDITY, UNENFORCEABILITY, AND
NON-INFRINGEMENT**

Plaintiff Ford Global Technologies, LLC ("FGTL") submits this separate Response in Opposition to Defendants' Motion for Partial Summary Judgment on Damages and Motion for Summary Judgment on Patent Invalidity, Unenforceability, and Non-Infringement (DN 215).

On September 10, 2018 FGTL filed its Response and Brief in Opposition to Defendants' Motion for Partial Summary Judgment on Damages and Motion for Summary Judgment on Patent Invalidity, Unenforceability, and Non-Infringement (DN 265) which states in reasonably concise terms why FGTL opposes Defendants' Motion for Summary Judgment as well as a Brief that sets forth argument and authorities on which FGTL relies in opposition to the Motion. On September 10, 2018 FGTL also filed an Appendix in Support of its Response and Brief in Opposition to Defendants' Motion for Summary Judgment (DN 266). For clarity of the record FGTL has filed

a Motion for Leave to file its Response as a separate docket entry from the Response and Brief that FGTL filed on September 10, 2018 as Docket Number 265.

FGTL opposes Defendants' Motion for Partial Summary Judgment on Damages and Motion for Summary Judgment on Patent Invalidity, Unenforceability, and Non-Infringement (DN 215) in its entirety and any matters required by LR 56.4(a) are contained in FGTL's Response and Brief in Opposition to Defendants' Summary Judgment Motion (DN 265) which was filed on September 10, 2018.

Date: September 12, 2018

Respectfully submitted,

/s/ Stephanie Barnes

Clyde M. Siebman
Texas State Bar No. 18341600
Stephanie R. Barnes
Texas State Bar No. 24045696
SIEBMAN, FORREST, BURG & SMITH, L.L.P.
Federal Courthouse Square
300 North Travis Street
Sherman, TX 75090
Telephone: (903) 870-0070 / Fax: (903) 870-0066
Email: clydesiebman@siebman.com
stephaniebarnes@siebman.com

Frank A. Angileri (P45611MI - *Pro Hac Vice*)
Marc Lorelli (P63156MI - *Pro Hac Vice*)
BROOKS KUSHMAN P.C.
1000 Town Center, 22nd Floor
Southfield, MI 48075
Telephone: (248) 358-4400 / Fax: (248) 358-3351
Email: fangileri@brookskushman.com
mlorelli@brookskushman.com

Elvin E. Smith, III
LAW OFFICES OF ELVIN E. SMITH III PLLC
307 Dartbrook Dr.
Rockwall, TX 75087
(972) 722-3332
Email: esmith@eeslaw.com

Attorneys for Ford Global Technologies

CERTIFICATE OF ELECTRONIC SERVICE

On September 12, 2018, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or *pro se* parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5 (b)(2).

/s/ Stephanie Barnes